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1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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3 JANE DOE, et al.,

4 Plaintiffs,

5 v.

18 Civ. 9936 (LGS)

6 THE TRUMP CORPORATION, et al.,

7 Defendants.

8 -----x

New York, N.Y.
March 12, 2020
3:45 p.m.

9
10
11 Before:

12 HON. LORNA G. SCHOFIELD

13 District Judge

14 APPEARANCES (via telephone)

15 KAPLAN HECKER & FINK LLP

16 Attorneys for Plaintiffs

17 BY: JOHN QUINN

ROBERTA KAPLAN

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19 Attorneys for Plaintiffs

20 BY: DAVID BERMAN

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21 SPEARS & IMES LLP

Attorneys for Defendants

22 BY: JOANNA HENDON

ANDREW KINCAID

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(In the robing room)

(Case called)

THE COURT: Okay. Good afternoon, counsel. So I have received your letters. I have reviewed your letters. I will say though I know there was one that was just filed on March 11, which I think it today -- it's today or yesterday. In any event, I have not been able to study that one, although I have looked at it.

I guess the place to start -- why don't we start with the matter that's easiest, and that is the request for production of documents that is outstanding. And, as I understand it, the parties essentially agreed to the production of these documents. They are from nine records custodians using 21 search terms. I understand there has been one piece of a rolling production from defendants, but there is more. So let me ask the defendants: How much more is there, and when will it be produced?

MS. HENDON: Joanna Hendon, your Honor, for the defendants. Good afternoon.

THE COURT: Good afternoon.

MS. HENDON: We have more, and we can start producing it this month. I have been in Los Angeles this week, and I am hoping to get back to New York City, but we will be in a position to continue rolling the production of those documents this month.

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1 THE COURT: OK. So what I really want to know is how
2 much is left. Let's start there. We have 252 documents that
3 have been produced. Is that a quarter of what there is? Is
4 that half? What's your estimate?

5 MS. HENDON: Do you know, Mr. Kincaid, what the total
6 volume that we have following the review of the 190,000
7 documents, what we have to produce?

8 MR. KINCAID: This is Andrew Kincaid from Spears &
9 Imes for the defendants. I would estimate that the 252
10 documents we produced as about half as a rough estimate of the
11 total volume that we estimate producing at the end of the
12 relevance and privilege search.

13 THE COURT: And what still needs to be done with the
14 documents that haven't been produced that is between here and
15 there and production?

16 MS. HENDON: Nothing, your Honor. It's just been a
17 matter of completing what was a very time consuming, lengthy
18 and substantial review.

19 THE COURT: But, as I understand it, you now have
20 identified the documents that are responsive and not
21 privileged. Do you need to do anything else to them before
22 they are produced?

23 MS. HENDON: No. I would like to look at them before
24 they go over, but I think that's something that can happen next
25 week.

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1 THE COURT: OK. So I'm going to ask that they be
2 produced by March 20, which is a week from tomorrow.

3 Then let's turn to the question of organizational
4 charts. I know that the plaintiffs had said that they are
5 hampered by the fact that they don't understand the positions
6 of various correspondence and their relative seniority, and so
7 it's hard for them, I presume, to make sense of the documents
8 they have, as well as decide who the essential deponents might
9 be. But I also understand that the defendants are saying that
10 this request covers 15 entities from basically 2005 to the
11 present and that is burdensome.

12 Have you all tried to talk to each other to come to
13 some agreement that makes this request as useful as possible to
14 the plaintiffs and as manageable as possible to the defendants?

15 MR. QUINN: John Quinn from Kaplan Hecker, your Honor.
16 We did invite defendants to have the conversation, and we were
17 told on a meet and confer that it was a blanket refusal and
18 that we should feel free to move on it, so that's what we did.
19 We would certainly welcome that conversation and have tried to
20 be throughout this process as reasonable and accommodating as
21 possible.

22 THE COURT: OK. And, Ms. Hendon, what's the situation
23 with the organizational charts?

24 MS. HENDON: The position is as follows, your Honor.
25 We think that essentially discovery is supposed to be

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1 proportional to the needs of the case, and the discovery that
2 the defendants have made already and in conversations I had
3 with Mr. Quinn we have been very up front, and the discovery we
4 provided shows this.

5 The case today is about Mr. Trump's relationship with
6 ACN, his paid endorsement of ACN, the things he said about ACN,
7 and among what we produced to the plaintiffs are the contracts
8 between Mr. Trump and ACN. The documents we produced make
9 clear -- and we have confirmed to plaintiffs -- that there are
10 no corporate entities involved in this transaction or
11 arrangement; it was personal to Mr. Trump. The contracts are
12 with him, not a corporation. And it's visible through the
13 documents that we produced -- again we have also asserted
14 this -- that it's been widely and repeatedly reported in
15 connection with many other legal proceedings involving
16 Mr. Trump and his businesses before he was President that
17 essentially Mr. Trump doesn't use e-mail, interacts with Rona
18 Graff his personal assistant for many years, interacts with
19 Ellen Weiselberg, interacts with Len Patton. You know, there
20 is a small number of people that he dealt with on this issue.

21 THE COURT: Let me just interrupt for a second. I
22 guess my question is: If that's the case, I would think there
23 would not be a tremendous volume of organizational charts, if
24 they exist at all. What do you know about the existence of the
25 documents?

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1 MS. HENDON: There are some organizational charts
2 within the Trump organization, as you would expect, I think,
3 but we view this as sort of an effort to just get into, and
4 root around in, and understand Donald Trump's business
5 relationships and how Donald Trump's companies intersect and
6 interact with each other in a way that is divorced from any
7 articulable need or relevance to what is at this time, your
8 Honor, a very simple straightforward fraud case.

9 THE COURT: Again, let me ask a question. I apologize
10 for interrupting you repeatedly, but I'm trying to be efficient
11 here.

12 So who on behalf of Mr. Trump or the Trump
13 organization dealt with ACN about this endorsement
14 relationship?

15 MS. HENDON: Mr. Trump, Rona Graff.

16 And, Andrew, will you supplement with any names I left
17 out.

18 MR. KINCAID: Andrew Kincaid for Spears & Imes.
19 That's largely correct. And to the extent that there are
20 additional individuals, they are apparent on the face any of
21 communications, but as Ms. Hendon noted a moment ago, the
22 contracts are with Mr. Trump personally, not through any
23 corporate entity, and as we said in meet and confer discussions
24 before, it's not clear to us -- and we haven't seen any
25 showing -- that organizational charts would lend any insight to

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1 that determination.

2 THE COURT: All I'm trying to get at is if you think
3 it's just Mr. Trump -- and did you say Ms. Grass?

4 MS. HENDON: Correct.

5 THE COURT: And then perhaps others who you say whose
6 roles are apparent from the communications.

7 MS. HENDON: Correct, exactly.

8 THE COURT: Let me just ask the plaintiffs, what more
9 do you need to have an understanding of what your documents
10 mean and who your witnesses are?

11 MR. QUINN: Thank you, your Honor. John Quinn again
12 from Kaplan Hecker for the plaintiff.

13 First, to the point about Trump organization
14 employees. Even based on the 252 documents we have received so
15 far, I have to say we don't agree with the characterization
16 that the defendants have given. In addition to the individuals
17 they've mentioned, there is a vice president of marketing, or
18 someone who appears to be a vice president of marketing, who
19 was on communications about ACN and Success magazine. Hope
20 Hicks, the former director of communications, appears on some
21 communications about ACN and Success magazine. These people's
22 positions over time isn't apparent to us. There are also
23 individual employees named whose names are simply new to us,
24 who are copied on e-mails about communications with ACN,
25 etcetera.

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1 But there are these individuals in the Trump
2 organization that we simply don't know what exactly their
3 position is, who they report to, and that may lead us to
4 additional custodians or deponents.

5 So it's simply not true that we have a clear picture
6 to what was going on in the Trump organization, and I think
7 defendants have conceded that Mr. Trump was using the employees
8 and the officers of The Trump Corporation in connection with
9 relevant events here.

10 So If there are organizational charts -- which Ms.
11 Hendon has acknowledged -- and those have already been compiled
12 and collected -- which we asked the defendants on a meet and
13 confer back in December and they confirmed -- certainly we need
14 those.

15 Even beyond just The Trump Corporation itself, the
16 mere fact that Donald Trump personally signed endorsement deals
17 doesn't change the fact that he then used a wider array of
18 entities and subsidiaries -- including, for example, Trump
19 Productions -- to then carry out the fraudulent scheme at issue
20 here. Trump Productions was intimately involved in
21 communications about inviting ACN onto Celebrity Apprentice,
22 controlling the content of how ACN would be presented, and then
23 dealing with how that footage could be used in the future. So
24 even beyond the Trump organization and the mere execution of
25 the agreements, there are the related entities outlined in the

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1 complaint that were used to perpetrate the scheme.

2 THE COURT: OK. Let me just interrupt there, and I
3 will tell you what my thinking is on this.

4 I understand the arguments on both sides, but it
5 strikes me that the plaintiff's request is somewhat overbroad.

6 I think you, plaintiffs, are certainly entitled to
7 understand who the people were who were involved in this
8 matter, who they reported to, what positions they were in, over
9 what period of time, and even perhaps of relevance maybe what
10 their relationship was to each other in the corporate
11 structure.

12 On the other hand, it also seems entirely possible to
13 me that there are whole pieces of the Trump organization that
14 would appear in the charts that have nothing to do with any of
15 those people or this matter, and frankly that's just not
16 relevant.

17 What I would like you to do is talk to each other, and
18 again by next Friday the 20th agree, if you can, on how to deal
19 with this problem.

20 I told you what I think the plaintiffs are entitled
21 to. I told you what I think the defendants are entitled to
22 withhold. See if you can come up with an agreement on how you
23 are going to accomplish that and do it quickly, and put that in
24 a letter to me on the 20th. OK?

25 MS. HENDON: Yes, your Honor. Thank you.

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1 MR. QUINN: Understood.

2 THE COURT: So the next issue is the scope of fact
3 discovery. And let me just preface this by saying that my
4 individual rules place certain limits on the scope of ESI
5 discovery. And of course we know that the Federal Rules of
6 Civil Procedure similarly place limits on discovery, for
7 example, the duration and number of depositions.

8 What I would just like to clarify is that I think
9 certainly my understanding with respect to my own rules -- but
10 even with respect to the federal rules -- is that these are
11 guidelines; they are not one size fits all for all cases. And
12 my own rules are intended to try to get cases in front of me
13 that reasonably require more discovery so that there is more
14 judicial management and so that things can be done in a way
15 that is efficient and proportionate but at the same time of the
16 greatest use and relevance to the party seeking the
17 information.

18 So, I'm not going to hold anyone to the hour limits or
19 the custodian limits that are in my rules, but what I would
20 like to say is that it seems to me that the plaintiff needs to
21 be able to tell me who the additional custodians are. And
22 actually you don't need to tell me; I frankly don't need to
23 know. But you do need to have an understanding of who the
24 additional custodians are and have that discussion with the
25 defendants.

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1 And I would urge the defendants to be reasonable. To
2 the extent those custodians have relevant information, and it's
3 a matter of extending search terms to an electronic search, I
4 would think that you should agree to a further production. But
5 I also think you probably want to talk to each other -- it
6 sounds like there isn't enough talking going on that is
7 cooperative here -- to figure out who the additional custodians
8 are. I will hear from the plaintiffs on that issue, if you'd
9 like?

10 MR. QUINN: Sure. Thank you, your Honor. John Quinn
11 from Kaplan Hecker.

12 At this point, as the Court knows, we got 252
13 documents from the defendants, so we are limited in our ability
14 to identify comprehensively the custodians that we would want.
15 Certainly, all the individuals who have been mentioned so far
16 both by defendant and then some of the additional names that I
17 mentioned would be on our list. So that would be I believe 15
18 total individuals on the list I have in front of me associated
19 or affiliated in one way or another with the Trump
20 organization. And certainly there could be more when we do
21 receive information about who people reported to and the like.

22 But certainly I welcome the Court's invitation to meet
23 and confer with defendants on this, with the understanding that
24 the parties won't be held to that limit, and I think we can
25 have a productive conversation and certainly make a first step

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1 at identifying some additional custodians based on the record
2 we now have.

3 THE COURT: OK. Ms. Hendon, anything you want to add?

4 MS. HENDON: No, that's fine, your Honor. I guess I
5 would like to add -- and I will be very brief -- and I wish I
6 said this at the outset, but I will say it now -- that it is
7 our position that now that our motion to compel arbitration is
8 pending, we are prejudiced every day by all of this
9 discovery -- in particular the third-party discovery -- but all
10 of it. And your Honor has directed us to meet and confer and
11 make document production, and of course we are going to do
12 that, but it is our view that because of the prejudice to us,
13 that the motion we filed in September really ought to be
14 decided as promptly as possible now, so that in the event of an
15 adverse decision for my clients, we can promptly appeal it.

16 It is our view that an arbitrator should be making all
17 the decisions that your Honor is having to take time out of her
18 schedule to decide at this point. But to your last comment, of
19 course we will meet and confer, and if they have identified six
20 more custodians, we will take that under advisement and of
21 course be reasonable.

22 THE COURT: So here is what I would suggest. I would
23 like to keep this thing moving, so if the remaining documents
24 are being produced by the 20th, what I would like is I would
25 like a joint letter on the 27th that tells me that you have

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1 reached agreement on the additional custodians, or telling me
2 that you've agreed except for, and then outline what the
3 remaining issues are, and I will then just rule on those
4 promptly so we don't get held up in extended meet and confer
5 sessions.

6 So then the issue is depositions, and I guess this is
7 a question for Mr. Quinn. I detect some tension in your letter
8 in the sense that understandably you would like to get as many
9 documents as you can before taking depositions for the usual
10 good reasons. On the other hand, you seem to be wanting to
11 take the depositions now and objecting to the fact that in your
12 view the defendants are obstructing the taking of depositions.

13 And I guess those two positions seem a little bit
14 inconsistent to me. I want to keep things moving, but I think
15 that it makes sense for you to just get your documents first
16 for us to work out who the custodians are, to get the second
17 wave of production, and then deal with the deposition issue.
18 But you tell me, Mr. Quinn.

19 MR. QUINN: Thank you, your Honor. The Court's
20 comment is very well taken. And that tension is really just a
21 product of our effort to as diligently as possible meet the
22 fact discovery cut-off set by the Court. We obviously
23 ultimately made a unilateral request for a lengthier extension.
24 The Court entered a 60-day extension, and we are simply trying
25 to do the best we can to get all the discovery we need and take

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1 the most productive possible depositions bearing in mind that
2 deadline.

3 That said, what the Court has proposed in term of
4 getting the documents and trying to close the document
5 record -- or at least substantially close the document
6 record -- and then proceeding to depositions makes great sense
7 to us, provided that the overall discovery deadlines can be
8 adjusted to accommodate that. Certainly it seems like a
9 sensible way to proceed, and we have no objection whatsoever to
10 doing that.

11 And I would just add in light of the recent events
12 around the Covid-19 pandemic, you know, that sort of
13 accommodation may make even more sense. I think everybody on
14 the phone is likely aware of this, and I would just add I hope
15 everybody stays healthy -- many of us are probably joining
16 remotely -- especially as we think about depositions in a case
17 where, for example, Jane Doe, the first plaintiff described in
18 the complaint, resides in California and is a hospice worker
19 who works regularly with the elderly. The logistics of
20 planning that deposition and doing it very quickly -- to say
21 nothing of the document issues the Court has raised -- I think
22 pose real challenges here. So, again, as long as the overall
23 schedule can be adjusted appropriately, we have no objection to
24 the way the Court has proposed about how to proceed.

25 THE COURT: OK. Ms. Hendon, I assume you don't have

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1 any objection to that either.

2 MS. HENDON: Well, I certainly object to the notion
3 that we're going to revisit and readjust the discovery schedule
4 more broadly.

5 Your Honor proposed getting document discovery done
6 before turning to the question of depositions. That sounds
7 reasonable to me, but I would say that as often as my adversary
8 uses the word "diligent" to describe their approach to party
9 discovery, we received the first deposition notices addressed
10 to the defendants in this case on February 27. That was days
11 before the close of fact discovery. So, I have no problem
12 making document discovery first and turning to the issue of
13 depositions, but all that Mr. Quinn said about embedding
14 notions of expanded deadlines beyond that, you know, we object
15 to, because it's our position the plaintiffs have been anything
16 but diligent with respect to party discovery in this case.

17 THE COURT: Wait, wait, wait. Before we get into
18 this, I mean we're going down a road of finger pointing, and
19 you may both have legitimate views, but frankly I don't want to
20 get into it. That isn't of particular concern to me.

21 My own view is I would like to keep this case moving
22 as quickly as possible for obvious reasons. My apology for my
23 contribution to the delay with the arbitration agreement, but
24 that will be forthcoming soon I hope.

25 So here is what I would like to do. We have documents

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1 by the 20th, additional custodians by the 27th. Why don't you
2 figure out then what follows on that, in other words, given
3 that, how much longer it will take the defendants to produce
4 documents, and put that in the same letter to me on the 27th.
5 And if you can't tell me that, then you can write a separate
6 letter with that, how long it's going to take to produce those
7 documents by let's say April 1.

8 I'm going to schedule a conference for us to follow up
9 on this on April 2. Let's do it April 2nd at 3 o'clock.

10 MS. HENDON: Your Honor, it's Joanna Hendon. I am
11 sorry to interrupt you, but I have an all day settlement
12 conference on April 2. Would it be possible to pick a day
13 earlier in the week or the following week?

14 THE COURT: Sure. Why don't we do April 1. And I
15 would like your letter then telling me what you think the
16 proposed timeframe is by the 30th, but feel free to include it
17 in the letter on the 27th, if you're able to do that.

18 And if you have agreed, and there doesn't seem to be
19 anything to discuss or resolve on April 1, then I will cancel
20 the conference. But if there are any outstanding issues, we
21 can have a conference on the 1st, and I will just rule. OK?

22 MS. KAPLAN: Your Honor, Ms. Kaplan. Depending upon
23 the coronavirus, Mr. Quinn and I may be on trial in London on
24 that date, so can we request that it be by phone? If it's by
25 phone, we'll make sure we can do it.

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1 THE COURT: Actually I think for the foreseeable
2 future we are doing everything by phone, so just make that
3 assumption.

4 MS. KAPLAN: I also have doubts whether we will get to
5 London, your Honor, so...

6 THE COURT: I was going to add that myself. And there
7 is always the risk you won't be able to come back if you go.

8 So, anyway, I will put all of this in an order so that
9 there is some clarity. If there is anything in the order
10 that's inconsistent with what I said, please follow the order.

11 Is there anything else that we need to talk about
12 today?

13 MS. HENDON: This is Joanna Hendon, your Honor. Some
14 of the items of dispute concern the number of years over which
15 defendants are review ESI material.

16 THE COURT: Thank you for reminding me. Could I ask a
17 question?

18 So I understand that the plaintiffs are saying that
19 this relationship between Mr. Trump -- I guess then
20 Mr. Trump -- and ACN started in 2005, but I also know that your
21 remaining causes of action are basically under state law. And
22 I wonder -- I don't know the answer to this -- but I wonder if
23 the relevant period isn't governed by the statute of
24 limitations applicable to each of those claims. Does anyone
25 know what the life of your claims are? Mr. Quinn or

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1 Ms. Kaplan?

2 MR. QUINN: Your Honor, we certainly have the dates on
3 which the plaintiff signed up and have made allegations as to
4 when the harm arose in terms of their failure to recoup their
5 investment.

6 Respectfully, on behalf of the plaintiff, the key
7 point with respect to the date range is that not only does the
8 relationship date back to 2005 -- which is when the relevant
9 agreements were signed and understandings were reached as to
10 how the endorsement would be given, how the message would be
11 shaped and how it could be used -- but the actual content that
12 we have alleged was fraudulent was created in 2006 for video
13 material, 2007 for print material, and the Celebrity Apprentice
14 episodes were filmed in 2009 and 2011, and as we outline in the
15 complaint, that same material was recycled and reused in
16 various ways, including with respect to each of the plaintiffs
17 and their decisions to enroll in the ACN business opportunity.

18 So, the creation of that material and the
19 circumstances around it are highly relevant to the fraud issue.
20 The truth of the statements, as well as the knowledge that the
21 defendants had, and the intent, that really is the time in
22 which the fraud itself is being concocted and the fraudulent
23 message is being recorded and written down.

24 THE COURT: I'll stop you right there. I understand
25 your point. It sounds pretty persuasive to me, but I haven't

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1 heard from Ms. Hendon.

2 MS. HENDON: Your Honor, when the statements were
3 created and when these disks were created is irrelevant to
4 their case. We don't have schemes and conspiracies in RICO
5 anymore. We have allegations that four people went to meetings
6 where these disks were played, and the disks contained
7 allegedly materially false and misleading statements and
8 omissions. You know, what was said and done and how --

9 THE COURT: Wait one second though. I don't
10 understand, and perhaps you can help clarify.

11 One is my recollection -- but I haven't gone back and
12 reread my decision on the motion to dismiss -- my recollection
13 is the reason we're still even here in federal court is because
14 of CAFRA jurisdiction. There are classes, and although there
15 was a nationwide class alleged, there were also state
16 subclasses I think from California and Pennsylvania, and I
17 don't remember what other states, and, therefore, there are
18 class members whose injuries may go back to a particular time.
19 But I also understand Mr. Quinn to be saying that the
20 fraudulent statements -- in other words, discovery around the
21 fraud and whether it was intentional, knowledgeable,
22 etcetera -- dates to the time that they were made, and that
23 predates the five year period. So maybe you can address that,
24 Ms. Hendon.

25 MS. HENDON: I guess I say the same thing. How is it

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1 relevant when these statements were created and the disks were
2 made? Some were maybe made in 2005, others were made later.
3 What matters to every plaintiff's cause of action, and what is
4 relevant to every plaintiff's cause of action, is not how were
5 the disks made and in whose studio were they shot and who
6 drafted the language that is used by Mr. Trump on the disks.
7 What matters is whether that language contained materially
8 false or misleading statements of omissions. That's what the
9 trier of fact is going to have to assess. The disk could have
10 been made in the 19th Century, but what is on them and what the
11 defendants say they heard, that's going to be the issue.

12 And if you waive the request -- I mean I understand
13 the facial appeal of what Mr. Quinn said, but how this risk was
14 developed -- whether it's 2005, 2006 or 2010 -- is of no
15 bearing at all on whether the words spoken by Mr. Trump were
16 false and misleading -- none whatsoever. All of these state
17 law claims have statutes of limitation periods.

18 THE COURT: Let me ask a question though. Isn't there
19 an element of both intent and -- I guess for lack of a better
20 word -- truth?

21 For example, let's say Mr. Trump made a recorded
22 statement in 2006 and he either believed it was true at the
23 time, or it actually was true at the time, and somehow it got
24 aired later. Wouldn't that be completely relevant to his
25 defense?

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1 MS. HENDON: He's going to defend that he thought
2 these statements were true when he made them, but it doesn't
3 matter what the pieces of paper are that exist in someone's
4 file or across their ESI from 2005 on that subject. His state
5 of mind is his state of mind, and we're going to do defend on
6 that, but we're not going to do that by bringing forward
7 documents from 2005, I promise you. I'm not going to resist
8 discover to the other side and then make my defense using the
9 same documents.

10 THE COURT: So let me just make a ruling here so that
11 we don't go on and on about this.

12 MS. KAPLAN: Your Honor, may I just say one more
13 thing. Last I heard fraud was an intentional tort, so we have
14 to show that at the time he made them he intended them to be
15 untrue. And all the documentation that may or may not exist
16 about what he was going to say when he said it, and whether it
17 was true, is highly relevant.

18 THE COURT: So stop. Let me ask you to stop there. I
19 understand both of your positions; here is my ruling.

20 My ruling is that I will allow discovery back to 2005,
21 but you need to take care with respect to any particular
22 request or search term that it makes sense to go back to that
23 period for that request.

24 In other words, I can conceive of requests that there
25 is no reason to go back that far, and others where it does make

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1 sense, so I'm going to allow requests to go back to 2005,
2 provided you have a good relevance argument and you're prepared
3 to defend it when and if the defendants object.

4 Let me also say to the defendants, I expect an honest
5 assessment of relevance from you so that you won't bring
6 arguments to me that something isn't relevant when it clearly
7 is. OK?

8 MR. QUINN: Understood, your Honor.

9 MS. HENDON: We would of course give you an honest
10 assessment of relevance.

11 THE COURT: I appreciate that. And you have been
12 forthcoming with the Court so far, and I appreciate that.

13 So let's stop there. I will issue an order as to
14 those issues. Are there any other issues that need to be
15 addressed now particularly with respect to document discovery,
16 so that we can be productive in the next couple of weeks?

17 MR. QUINN: Nothing further from plaintiff, your
18 Honor. Thank you.

19 MS. HENDON: Nor from the defense, your Honor. Thank
20 you.

21 THE COURT: All right. Thank you very much. We are
22 adjourned.